

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Service Rules for Advanced Wireless
Services in the 2155-2175 MHz Band

]]]]

WT Docket No. 07-195

COMMENTS OF THE HIGHER EDUCATION WIRELESS ACCESS CONSORTIUM (HEWAC)
AND COLLEGE PARENTS OF AMERICA (CPA)

December 14, 2007

College Parents of America
James Boyle, President
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Arlington, Virginia 22201

**Higher Education Wireless
Access Consortium**
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5607 Braddock Farms Way
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Executive Summary

Broadband access to the Internet has helped to initiate a 21st century transformation of U.S. education. Largely gone are the days of students relying on hard-bound encyclopedias or knowledge of the Dewey Decimal Classification to complete assignments. In fact, broadband often makes classroom attendance itself optional. Today, even some of the youngest students use the Internet as their library while mature students are taking classes online as they balance busy lives with their educational goals. For those who have it, broadband can make a profound difference in the nature and quality of their education. Increased broadband availability and affordability, therefore, will supplement and improve the current educational benefits of broadband.

HEWAC and CPA believe that expanding educational opportunities through technology, particularly broadband, must be a top priority for the Commission and the United States. By incorporating broadband Internet into every home and classroom, the American workforce will gain the skills and training necessary to keep our country competitive. An affordable, universally available wireless broadband service in the 2155-2175 MHz band will advance this critical policy goal in three vitally important ways: (1) finally close the digital divide and ensure equal access to world class education in every classroom; (2) help elementary, secondary, post-secondary, and continuing education institutions train and retrain a workforce that will one day lead America into the 21st Century's digital economy; and (3) ensure that America remains at the cutting edge of innovation and a leader in global economic competitiveness. The time to act is now.

broadband service that includes protection against children accessing pornography.⁶ Such a network will ensure that children and families have access to the full education opportunities of broadband in a safe and responsible manner.

I. BROADBAND ACCESS TO THE INTERNET AND K-12 LEARNING OPPORTUNITIES ARE NOW INEXTRICABLY LINKED

In a March 1, 2007 letter to the Commission regarding the establishment of a free, nationwide wireless broadband network, the National Parent Teacher Association (PTA) explained that education "is the primary vehicle for ensuring that children from every demographic and ethnic background in this country have equal access to the tools that will allow them to compete and contribute to the welfare of our American society."⁷ While education is a tool for success, the Internet has now become a "tool" for education. This point is demonstrated by the fact that legislators seek to promote Internet access in early education through the Universal Service Administrative Company's E-Rate program. Formally known as the Schools and Libraries program, E-Rate was established to provide discounts to help most schools and libraries in the United States obtain affordable telecommunications and Internet access.⁸ Over the life of the program, nearly \$19 billion dollars has been committed in the educational infrastructure that students need to succeed in the 21st Century economy, including more than \$1.6 billion in 2005.⁹ These massive investments show the obvious governmental interest in ensuring that children have access to broadband in the classroom. Wiring schools and libraries, however, is simply step one in assuring that children have full and unobstructed access to the panoply of educational tools available through broadband access to the Internet.

⁶ See *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band*, WT Docket No. 07-195, Notice of Proposed Rulemaking, FCC 07-164 (rel. Sept. 19, 2007) ("NPRM") at para. 86.

⁷ See Comments of the National PTA, attached as Appendix B.

⁸ See USAC website at <http://www.usac.org/sl/about/overview-program.aspx>.

⁹ See Reaching Out, 2006 USAC Annual Report, at 44-45

There is an old adage that learning should not end at the school house door. That is why HEWAC and CPA believe that students must have broadband access at school *and at home*. The modern educational tools that broadband offers schools should not be confined to the classroom. The reality is that even those children with classroom connections cannot “take it with them” when they head home in the afternoon. Unfortunately, scores of children lack broadband access at home. In many ways, this creates a dilemma for educators. Giving a web-related assignment to an unconnected student is the 21st Century equivalent of assigning a book report when the required materials have already been checked out of the library.

In June of 2007, community leaders from Bertie County, North Carolina assembled in Raleigh to call on the FCC to ensure that the spectrum at issue in this NPRM is used to deploy a free nationwide wireless broadband network. At that event, Brittney Payton, now a senior at Bertie High School, said that she is so committed to ensuring Internet access be available to others that she shares her home *dial-up connection* with her fellow students. No American student should have to resort to these measures to gain access to the Internet. The Commission must do more to connect all our students and families to the educational opportunities of broadband.

II. COLLEGE STUDENTS COULD GREATLY BENEFIT FROM A FREE NATIONWIDE BROADBAND NETWORK

Unlike K-12, there is no national effort to connect college students.¹⁰ HEWAC previously explained to the Commission that just over half (51.2 percent) of college classrooms are currently connected to the Internet wirelessly.¹¹ The lack of a wireless, or in some cases any connection, hampers students' productivity and diminishes their learning experience.

¹⁰ CPA and HEWAC recognize that the Commission has assigned spectrum for educational use in the Educational Broadband Service (EBS). While hundreds of schools are EBS licensees, thousands more are not. A free nationwide broadband service would be available not only to every school in the country but every student. In light of the fallow nature of the 2155-2175 MHz band, the Commission should not pass up the opportunity to level the playing field for educational access to broadband.

¹¹ See Comments of HEWAC, attached as Appendix D.

EDUCAUSE, a leading advocate for institutions of higher education, agreed with HEWAC in its February 28, 2007 letter to the FCC. EDUCAUSE explained that:

higher education institutions must utilize information technology to its fullest potential. In particular, the widespread availability of affordable broadband communications would make both campus-based and distance learning more accessible and effective.¹²

Ubiquitous broadband Internet access empowers teachers and students by taking the educational experience beyond the walls of the classroom. But such connections currently come at a high price.

Earlier this year, the College Parents of America explained that the cost of broadband access is an outlier compared to other educational tools:

In an era when other tools essential to education – such as computers and laptops – are increasing in power, rapidly innovating, AND falling dramatically in price, we would like to see a concurrent fall in the costs associated with broadband access and to see more choice of providers in the market. Such a development would have the dual impact of improving the ability for students to pursue their academic dreams, while helping to prevent the college experience from becoming a family financial nightmare.¹³

The cost of broadband is a particularly pressing problem at community colleges because regardless of the level of on-campus connectivity, community colleges do not have dormitory facilities so students must eventually depart the campus and attempt to foot the bill for broadband on their own, if at all. We recently calculated that cutting the cost of broadband to zero would pay for 20 percent of the average annual tuition costs of community college.¹⁴ Even for parents who are paying outrageous tuition prices at that nation's most prestigious private

¹² See Comments of Educause, attached as Appendix F.

¹³ See Comments of CPA, attached as Appendix C. College Parents of America further explained that "In the past five years, the average cost of in-state tuition and fees at public colleges has jumped 35% (after adjustment for inflation) and in the past 25 years, the average cost of tuition and fees has risen faster than personal income, consumer prices and even health insurance."

¹⁴ Based on the Americans Association of Community Colleges average annual tuition and fees (\$2272) and the average cost of broadband being at least \$32 to \$41 per month (from Pew 2006) for 12 months, broadband can easily add 20% to the cost of tuition.

universities, a discount of \$1,750 dollars or more over the course of a four year degree would be a substantial savings.

In an opinion piece published on March 30, 2007 in the Community College Times, Panola College President Gregory Powell addresses the issue of broadband access in America's college system.¹⁵ Powell wrote: "When people ask me as a college president what they can do to support education, I surprise them with four short words: 'Help us get broadband.'"¹⁶ Powell supported his call to action by explaining the challenge for many of his students to access broadband:

With broadband, a student is not confined to time or place and can do schoolwork for as long as he or she wants at a time of their choosing. This flexibility is especially important for students like ours who often work varying shift hours at full-time jobs or live by the natural rhythm of a farm or ranch. However, for most of our students, broadband at home simply is not an option – either the wires do not run to their community, or the service is so expensive they cannot afford it.

The expense of broadband, however, presents greater challenges for America's international competitiveness. The League for Innovation in the Community College squarely addressed this issue when they noted that:

Nothing is more crucial to innovation and education in the 21st century than broadband access to the Internet. Unfortunately, the United States has fallen behind in our rate of broadband penetration, ranking 21st in the world. For our students to learn and compete in a global economy, they must have access to the best information technology. It is imperative for our students to be connected as they move from class to class and from the classroom to home.¹⁷

These sentiments were echoed by the National Institute for Staff and Organizational Development ("NISOD"), which articulated the absolute necessity of the United States focusing on technology in order to ensure our global competitiveness in the future:

¹⁵ Panola College of Carthage, Texas has an active Distance Learning Department offering a variety of both Internet and Instructional Television (ITV) courses. In addition, Panola College participates as a Host and Provider college in the [Virtual College of Texas](#) and the [North East Texas Network \(NETnet\)](#).

¹⁶ See Gregory Powell, "Broadband critical to distance education in rural America," Community College Times, March 30, 2007

¹⁷ See Comments of the League for Innovation in the Community College, attached as Appendix A.

Educational systems, public and private, face unparalleled calls to provide infrastructure for a stable and successful society. Knowledgeable workers with cutting-edge information and skills are a competitive advantage that the American economy needs to survive and grow in this new economy.¹⁸

As these letters indicate, the need to ensure available and affordable connections to the broadband Internet is reaching crisis proportions. Not only are too many American students being asked to do a nearly impossible task in modern America – getting into and succeeding in college without broadband – but the Commission's lack of vision and lack of action to promote ubiquitous broadband is crippling our great nation's ability to compete in a world economy defined by light speed communications technologies. As such, the American workforce is stuck with an education system that cannot fully prepare them for the challenges of tomorrow's information economy.

III. THE NEW FREE NETWORK IN 2155-2175 SHOULD PROTECT AGAINST UNDERAGE CHILDREN ACCESSING OBSCENE ONLINE CONTENT

Simply opening the gates to broadband connectivity would be irresponsible. As the PTA pointed out, the number one factor that limits the ability of students to use the Internet is “the risk that children will be exposed to indecent material.”¹⁹ CPA's membership represents not only parents with children actively in college but also parents with teenage children preparing for the college experience and shares this concern with PTA. Put simply, we all have a responsibility to ensure that young students can safely use the Internet and technology. This past August, it was reported in the press that the Australian government invested \$84 million in developing a pornography filter which was hacked by a 16 year old schoolboy within 30 minutes of going live. The government released an upgrade to remedy the situation and the same schoolboy was able to hack that within an additional 40 minutes.

¹⁸ See comments of NISOD, attached as Appendix E.

¹⁹ See Comments of the National PTA, attached as Appendix B.

Without spending one dollar of taxpayer money, HEWAC and CPA believe the Commission can spur the development of protective technology by requiring that any licensee of the 2155-2175 MHz band deploy network-based filter technology to protect our children from obscene material. To date, no operational broadband provider has volunteered to include this type of technology in a nationwide service offering. Free television providers are limited in the type of material that can be broadcast over the airwaves and we believe the Commission can create the right incentives to ensure that providers of any free broadband service will be held to a similar standard.

IV. CONCLUSION

HEWAC and CPA believe that learning must be a lifelong process. From elementary school to retirement, the workforce of today and tomorrow must remain technologically current through continual training and skills development. By promulgating service rules for the 2155 to 2175 MHz band that require the provision of an affordable, universally available wireless broadband service, the FCC can further this policy goal in three vitally important ways: (1) finally bridge the digital divide and ensure equal access to world class education at all levels; (2) help elementary, secondary, post-secondary, and continuing education institutions train and retrain a workforce that will one day lead America into the 21st Century's digital economy; and (3) ensure that America remains at the cutting edge of innovation and a leader in global economic competitiveness. Americans have waited long enough for the tools necessary to compete; the time to act is now.

Respectively submitted,

College Parents of America (CPA)

By: _____

James Boyle, President
CPA
2000 N. 14th Street, Suite 800
Arlington, Virginia 22201

**Higher Education Wireless Access Consortium
(HEWAC)**

By:  _____

Brian Christie, Senior Vice President
HEWAC
5607 Braddock Farms Way
Clifton, VA 20124

December 14, 2007

Appendices:

- Appendix A: Comments of the League for Innovation in the Community College
- Appendix B: Comments of the Parent Teacher Association (PTA)
- Appendix C: Comments of College Parents of America (CPA)
- Appendix D: Comments of the Higher Education Wireless Access Consortium (HEWAC)
- Appendix E: Comments of the National Institute for Staff and Organizational Development (NISOD)
- Appendix F: Comments of EDUCAUSE

Appendix A

Comments of the League for Innovation in the
Community College

February 12, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, SW
Room #8B-201
Washington, DC 20554

RE: Free Wireless Broadband Internet

Dear Mr. Chairman,

I am writing to you from the League for Innovation in the Community College. The League for Innovation and its over 850 member institutions are committed to improving community colleges through innovation, experimentation, and institutional transformation. I would like to offer support for M2Z Networks' application to provide nationwide broadband Internet access.

The growing importance of the Internet has placed a spotlight on the digital divide that has left too many Americans without adequate access to the Internet. Internet access is no longer a luxury item, but a resource used by many. Although computer ownership and Internet access rates are increasing for all groups, there are still communities that do not have adequate access to the Internet and technology-based training, resources, and services. This divide has limited opportunities to learn, succeed economically, and participate in society. It is critical that the FCC work to promote universal Internet access for all Americans and we believe M2Z's fast, free, family-friendly service will work toward this goal by leveling the playing field of the information economy.

Nothing is more crucial to innovation and education in the 21st century than broadband access to the Internet. Unfortunately, the United States has fallen behind in our rate of broadband penetration, ranking 21st in the world. For our students to learn and compete in the global economy, they must have access to the best information technology. It is imperative for our students to be connected as they move from class to class and from the classroom to the home. Many of our students work during the day and take classes at night, making remote electronic access to their coursework and class material a necessity. Nationwide wireless broadband access will bridge this gap and ensure that learning is not constrained by a cord or the availability of a local hotspot.

Broadband access is particularly important for students and colleges in rural areas. The Internet has the potential to revolutionize the way our students learn and work. However, the lack of consistent, high speed access across the country prevents students from taking full advantage of this remarkable resource. We believe that ubiquitous broadband access will open the door to learning and innovation for all Americans.

I encourage you to approve M2Z's application to provide nationwide wireless broadband access. By expanding broadband Internet access to all Americans, M2Z's proposal will help ensure today's community college students harness the power of the Internet as they become the workforce of tomorrow.

Sincerely,

A handwritten signature in black ink, reading "Gerardo E. de los Santos". The signature is fluid and cursive, with the first name "Gerardo" being the most prominent.

Gerardo E. de los Santos
President and CEO
League for Innovation in the Community College

cc: Commissioner Michael J. Copps
Federal Communications Commission

Commissioner Jonathan S. Adelstein
Federal Communications Commission

Commissioner Deborah Taylor Tate
Federal Communications Commission

Commissioner Robert M. McDowell
Federal Communications Commission

REC'D

Appendix B

Comments of the

Parent Teacher Association (PTA)



March 1, 2007

The Honorable Kevin Martin
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: License Application of M2Z Networks, Inc., WT Docket No. 07-16

Dear Chairman Martin:

On behalf of the National PTA, the nation's oldest and largest child advocacy organization, representing 5.5 million parents, teachers, students, and other child advocates, I am writing to express our support for the free, family-friendly, filtered broadband service proposed by M2Z Networks in their license application filed on May 5, 2006 before the Commission.

Since its founding in 1897, PTA has reminded our country of its obligations to children and provided parents and families with a powerful voice to speak on behalf of every child. PTA strives to provide parents with the best tools to help their children succeed in school and in life. With more than 25,000 local, council, district, and state PTAs in the 50 states, the District of Columbia, the U.S. Virgin Islands, and Department of Defense Dependents Schools overseas, membership in PTA is open to anyone who supports the Mission and Purposes of PTA.

PTA's Purposes are

- To promote the welfare of children and youth in home, school, community, and place of worship.
- To raise the standards of home life.
- To secure adequate laws for the care and protection of children and youth.
- To bring into closer relation the home and the school, that parents and teachers may cooperate intelligently in the education of children and youth.
- To develop between educators and the general public such united efforts as will secure for all children and youth the highest advantages in physical, mental, social, and spiritual education.

For the past 10 years, PTA has been an ardent advocate for the E-Rate program. E-Rate provides deep discounts to public and private schools and public libraries for telecommunications services, Internet access and internal connections. E-Rate has been a vital tool for supporting parent participation in schools. Through E-Rate-supported connectivity, parents are able to see their children's grades, track their student's progress, and communicate on a regular basis with teachers. E-Rate funding is also a critical component of helping school districts to meet to NCLB requirements to provide parents and the public with report cards on the progress of the district and its individual schools.

When E-rate commenced operation in 1998, only 14% of public school instructional classrooms were

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connected to the net; as of 2005, classroom Internet access stands at 94%. In addition, nearly all public library outlets are now able to offer Internet access to their patrons. As we approach full connectivity of every public school instructional classroom, we must look to the next step, providing high-speed Internet access.

As part of our advocacy, the National PTA's constantly searches out appropriate ways to assist parents and children so that they can maximize their educational experience and are empowered to be productive adults. Education, obviously, is the primary vehicle for ensuring that children from every demographic and ethnic background in this country have equal access to the tools that will allow them to compete and contribute to the welfare of our American society.

Based on our thorough consideration of M2Z's proposal, we have concluded that it represents a timely and much needed opportunity to provide free broadband service to America's families. As you and your fellow Commissioners know so well, three major barriers exist today that severely limit broadband access for families throughout the United States. They are: first, the risk that children will be exposed to indecent material; second, income barriers; and, third, geographic barriers. Importantly, M2Z's proposal explicitly addresses all three barriers.

We are especially encouraged by the prospect of Title I families and the schools that serve them being able to enjoy free access to broadband services as proposed by M2Z. We commend the founders of M2Z for their commitment to a privately financed source of broadband that is appropriate for children. We also believe the privately financed buildout proposed by M2Z, represents equitable consideration for the use of the proposed spectrum. Importantly, M2Z's proposal does not diminish E-Rate funding for schools and libraries; instead M2Z's proposal compliments and supplements E-Rate funding.

In addition, we applaud M2Z for voluntarily committing to pay 5 percent of gross revenues of their premium service to the federal treasury. We strongly urge the Commission to assign all or a significant portion of these spectrum revenues from M2Z's graduated lease arrangement to financially support the educational needs of children.

PTA believes that education is the bedrock of our democracy and we view the M2Z proposal as an innovative and equitable way to ensure that broadband is an educational resource available to all Americans – parents, children and educators. Thank you for your consideration of our support and we urge prompt action to ensure that the goals proposed by M2Z Networks in its license application can be realized as quickly as possible.

If PTA can provide you with any information or assistance, please contact Todd Haiken, Senior Public Policy Specialist, at 202-289-6790.

Sincerely,



Anna Weselak
PTA National President

cc: The Honorable Michael J. Copps, Commissioner, FCC
The Honorable Jonathan Adelstein, Commissioner, FCC
The Honorable Deborah Taylor Tate, Commissioner, FCC
The Honorable Robert McDowell, Commissioner, FCC

Appendix C

Comments of the College Parents of America
(CPA)



February 28, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, SW
Room #8B-201
Washington, DC 20554

RE: M2Z Networks' Broadband Proposal (WT Docket 07-16 and 07-30)

Dear Mr. Chairman:

As the only national membership association dedicated to advocating on behalf of parents as they prepare for and put their children through college, College Parents of America is rapidly growing with approximately 102,000 members and subscribers and over 125 institutional members, including colleges and universities.

College Parents of America is dedicated to making higher education affordable, accessible – and successful – for all Americans. In the past five years, the average cost of in-state tuition and fees at public colleges has jumped 35% (after adjustment for inflation) and in the past 25 years, the average cost of tuition and fees has risen faster than personal income, consumer prices and even health insurance. These increases in costs are making higher education less accessible. Therefore, we must seek every possible solution to lower costs for parents and students. This should include not only tuition, but all costs associated with education, including the provision of academic resources, such as those available online, as well as the delivery of distance education.

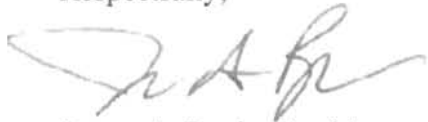
College Parents of America strongly supports the notion of a “free” broadband service for college students, their families, academia and small businesses. As you can imagine Mr. Chairman, availability of such a service would provide significant relief to college parents struggling to pay for their children’s education. And it would also enable many students to better pursue their academic endeavors and to better participate in less costly distance education programs.

In an era when other tools essential to education – such as computers and laptops -- are increasing in power, rapidly innovating, AND falling dramatically in price, we would like to see a concurrent fall in the costs associated with broadband access and to see more choice of providers in the market. Such a development would have the dual impact of improving the ability for students to pursue their academic dreams, while helping to prevent the college experience from becoming a family financial nightmare.

The Internet has become inextricably linked with college and university study here in the U.S. Free broadband Internet access is absolutely critical to helping the U.S. to maintain its leadership role in higher education.

We support M2Z Networks' application to provide America with a Fast, Free, and Family-Friendly wireless Internet network and urge the FCC to fast track and grant M2Z's license.

Respectfully,

A handwritten signature in dark ink, appearing to read 'JAB', is written over a light gray horizontal line.

James A. Boyle, President
for College Parents of America

cc: Commissioner Michael J. Copps
Federal Communications Commission

Commissioner Jonathan S. Adelstein
Federal Communications Commission

Commissioner Deborah Taylor Tate
Federal Communications Commission

Commissioner Robert M. McDowell
Federal Communications Commission

Appendix D

Comments of the Higher Education Wireless
Access Consortium (HEWAC)



February 14, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, SW
Room #8B-201
Washington, DC 20554

RE: M2Z Networks' Broadband Proposal (WT Docket 07-16)

Mr. Chairman:

I am writing to you on behalf of the Higher Education Wireless Access Consortium (HEWAC), the only member-driven organization solely focusing on wireless technology for higher education. The vision of HEWAC is to promote and enable the rapid deployment of wireless computing and other wireless access technology at all higher education institutions worldwide. I am writing to express my support for M2Z Networks' application to provide a free nationwide wireless broadband Internet service.

HEWAC looks beyond technology for technology's sake and views broadband wireless technology as an enabling tool to support its members' individual, educational and social missions. Used in conjunction with an institution's existing Internet capabilities, wireless broadband access would enhance the overall experience and learning environment for students, faculty, and the surrounding community.

Higher education institutions have made great strides in providing wireless Internet access to their students, but obstacles remain. According recent surveys, although most colleges and universities in the U.S. indicate they have a strategic plan to implement a wireless computing network, just over half (51.2 percent) of college classrooms are linked to the Internet through wireless networks. Those left behind are campuses with fewer resources and disproportionately, lower income students.

The service proposed by M2Z Networks would not replace existing networks on campus, but would supplement them. Thus, M2Z's wireless broadband service would bridge the connectivity gaps on our nation's campuses. Moreover, in the case of older schools or portable classrooms, wireless networks offer a quick – and, sometimes, the only – practical way to get students online. Wireless access to the Internet is crucial in a campus setting, because the mobility of computing without wires enhances students' overall ability to function and learn inside the classroom and out.



HEWAC believes that ubiquitous wireless broadband access would be highly advantageous for America's learning communities. For that reason, HEWAC urges the Commission to approve M2Z Networks' proposal for a free nationwide broadband Internet service. By expanding broadband access to all Americans, M2Z's service will help ensure that colleges, universities, and students can harness the full educational potential of the Internet.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Christie', with a long horizontal line extending to the right.

Brian Christie
Sr. Vice President
Higher Education Wireless Access Consortium

cc: Commissioner Michael J. Copps
Federal Communications Commission

Commissioner Jonathan S. Adelstein
Federal Communications Commission

Commissioner Deborah Taylor Tate
Federal Communications Commission

Commissioner Robert M. McDowell
Federal Communications Commission

Appendix E

Comments of the National Institute for Staff and
Organizational Development (NISOD)



COLLEGE OF EDUCATION

THE UNIVERSITY OF TEXAS AT AUSTIN

National Institute for Staff and Organizational Development (NISOD)

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April 18, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th street, SW
Room #8B-201
Washington, DC 20554

RE: M2Z's Wireless Broadband Service (WT Docket 07-16 & 07-30)

Dear Mr. Chairman,

I am writing to you on behalf of the National Institute for Staff and Organizational Development (NISOD) to express our strong support for the pending license application of M2Z Networks, Inc. (M2Z). As part of the Community College Leadership Program (CCLP) of the University of Texas at Austin, it is the job of NISOD to help community college leaders stay on the cutting edge of American education. Over 700 community colleges around the world are now NISOD-members, including almost every large community college district, the majority of urban and technical colleges in the United States, and more than 200 small, rural colleges around the world. It is on behalf of our members that I strongly urge you to act now to grant M2Z's spectrum license application.

The United States has entered the twenty-first century as an emerging "digital democracy" and in this digital democracy the role of higher education is central. Educational systems, public and private, face unparalleled calls to provide infrastructure for a stable and successful society. Knowledgeable workers with cutting-edge information and skills are a competitive advantage that the American economy needs to survive and grow in this new economy.

The Internet has provided new and interesting ways to engage in the learning process. At the same time, a troubling trend has emerged; the promise and power of information technology and the Internet is not being realized equally in our society. As you know a digital divide now segregates low-income and rural Americans. The lack of technology access and corresponding skills puts disadvantaged members of our society increasingly at risk of becoming disenfranchised spectators of a digital world that is passing them by.

As educators, there is a simple formula for ensuring success in this new digital world; *access plus quality instruction.*

Our Community colleges are working hard to develop relevant, quality instructional material for their student bodies, but we also need the government and its regulators to play their parts to enable private sector innovation to come to the market in support of our efforts. M2Z's plan to provide fast, free, family-friendly broadband Internet access to 95% of the population will increase access to important Internet technologies that are not currently available by many Americans. This is exactly the kind of help the American educational system needs from the marketplace.

The opportunity before you and your colleagues at the Federal Communications Commission (FCC) to grant M2Z's license and to benefit the public interest is profound – and this choice will dictate whether or not we and our students can truly live free in this increasingly interconnected world. By granting M2Z's license, the FCC will be taking a huge step toward greater digital inclusion in this country and will also be strengthening the underpinnings of our new digital democracy.

Sincerely,



Dr. Mark David Milliron
Suanne Davis Roueche Endowed Fellow, Senior Lecturer, & Director
National Institute for Staff and Organizational Development (NISOD)
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<http://www.nisod.org/>

cc: Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell

Appendix F

Comments of EDUCAUSE



February 28, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, SW
Room #8B-201
Washington, DC 20554

RE: Free Nationwide Wireless Broadband Access (WT Docket 07-16 and WT Docket 07-30)

Mr. Chairman:

I am writing to you on behalf of EDUCAUSE, a nonprofit association whose mission is to advance higher education by promoting the intelligent use of information technology. Our current membership comprises more than 2,000 colleges, universities, and educational organizations, including 200 corporations, with over 16,500 active members. It is EDUCAUSE's belief that affordable access to high-speed Internet connectivity, regardless of the technology being deployed, is essential for higher education to provide faculty, researchers, and students with the capacity to access information and collaborate via distance/distributed learning. We believe that a free nationwide wireless broadband Internet service would be beneficial to our nation's students, as well as all Americans.

A primary goal of EDUCAUSE is to ensure that, regardless of location, those who want to learn have affordable, convenient access to quality education. EDUCAUSE envisions a future in which education is active and learner centered, and occurs in both formal and informal environments. To achieve these goals, higher education institutions must utilize information technology to its fullest potential. In particular, the widespread availability of affordable broadband communications would make both campus-based and distance learning more accessible and effective.

EDUCAUSE believes that the appropriate role for technology is to serve as a tool to enhance teaching and learning. Ubiquitous broadband Internet access would empower teachers and promote student success by taking the educational experience beyond the walls of the classroom. It is critical that higher education keeps pace with advancing technology in a rapidly changing, competitive world.

Affordable broadband access for everyone will be an essential driver of America's educational, economic and social development. As more students gain access to always-



on, available-anywhere broadband, their learning opportunities will increase exponentially. But when such access is delayed, the American education community is disadvantaged in the global information arena.

EDUCAUSE believes it is in the public interest for the Commission to use all of the means available to it, as authorized by Congress, to make universal and affordable broadband a reality. I encourage the Commission to give serious consideration to all license applications before it that offer innovative means of making wireless broadband more available and more affordable to all parts of our country and our economy. By opening the door to broadband Internet access to all Americans, the FCC will help today's students – the workforce of the future – meet the challenges of the 21st century.

Sincerely,

Brian L. Hawkins
President
EDUCAUSE

cc: Commissioner Michael J. Copps
Federal Communications Commission

Commissioner Jonathan S. Adelstein
Federal Communications Commission

Commissioner Deborah Taylor Tate
Federal Communications Commission

Commissioner Robert M. McDowell
Federal Communications Commission